

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

STATE OF FLORIDA, et al.
Appellants,

v.

DEPARTMENT OF HEALTH AND
HUMAN SERVICES, et al.
Appellees.

Nos. 25-11927; 25-12095

**APPELLANTS' UNOPPOSED MOTION TO CONSOLIDATE
AND RESET 40-DAY BRIEFING NOTICE**

CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT

Appellants State of Florida, Florida Department of Management Services, Florida Agency for Health Care Administration, and Catholic Medical Association, file this Certificate of Interested Persons and Corporate Disclosure Statement pursuant to Eleventh Circuit Rules 26.1-1 through 26.1-3.

No publicly traded company has an interest in the outcome of this appeal. The following individuals and entities may have an interest in the outcome of this case:

Alliance Defending Freedom

Akey, Angeli Maun, of Gainesville, Florida

Blake, Julie Marie, Alliance Defending Freedom

Bowman, Matthew, Alliance Defending Freedom

Boyden Gray PLLC

Catholic Medical Association

Centers for Medicare and Medicaid Services

Conde, James Ryan, Boyden Gray PLLC

Cortman, David Andrew, Alliance Defending Freedom

Department of Health and Human Services

DeSousa, Jeffrey DeSousa, Florida Attorney General's Office

Florida

Florida Agency for Health Care Administration

Florida Department of Management Services

Florida Attorney General's Office

Holland, Liam C., U.S. Department of Justice

Honold, Ashley Cheung, U.S. Department of Justice

Huang, Allen L., Florida Attorney General's Office

Jung, William Frederic, U.S. District Judge

Kaiser, Rachel T., of Nashville, Tennessee

Kehoe, Gregory W., U.S. Attorney for the Middle District of Florida

Kennedy, Jr., Robert F., Secretary, Department of Health and Human
Services

Larson, Kristen, Florida Department of Management Services

McCotter, R. Trent, Boyden Gray PLLC

Oz, Mehmet Administrator, Centers for Medicare and Medicaid Services

Parker, Michael S. of Mansfield, Ohio

Pope, Allison Holly, Alliance Defending Freedom

Scarborough, Charles, U.S. Department of Justice

Sheeran, Andrew, Florida Agency for Healthcare Administration

Sherwood, Zachary, U.S. Department of Justice

Stannard, Paula M., Director, Office for Civil Rights, Department of Health
and Human Services

Uthmeier, James, Florida Attorney General

Van Meter, Quentin L. of Atlanta, Georgia

ARGUMENT

Appellants State of Florida, Florida Department of Management Services, Florida Agency for Health Care Administration, and Catholic Medical Association, move to consolidate appeal Nos. 25-11297 and 25-12095. Both appeals arise from the same civil action, 8:24-cv-01080-WFJ-TGW (M.D. Fla.), involve the same parties, and present the same question: whether this civil action is moot. Because the appeals arise from the same case, involve the same parties, and present the same question, judicial economy requires consolidation. Under 11 Cir. R. 27-1(c)(7), the clerk may act upon this motion because it seeks “to consolidate appeals from the same district court.” Under 11th Cir. R. 31-1(b), the clerk must also reset the 40-day briefing schedule once it acts on the motion. This motion is unopposed.

CONCLUSION

The Court should grant Appellants’ motion to consolidate appeal Nos. 25-11297 and 25-12095 and reset the briefing schedule.

Respectfully submitted,

JAMES UTHMEIER
ATTORNEY GENERAL

JEFFREY DESOUSA
ACTING SOLICITOR GENERAL

/S/ ALLEN L. HUANG
ALLEN L. HUANG*
DEPUTY SOLICITOR GENERAL
Office of the Attorney General
The Capitol, Pl-01
Tallahassee, Florida 32399-1050
(850) 414-3300
(850) 410-2672 (fax)
Allen.Huang@myfloridalegal.com

** Lead Counsel*
Counsel for Plaintiff State of Florida

/S/ MATTHEW S. BOWMAN
MATTHEW S. BOWMAN*
Alliance Defending Freedom
440 First Street NW, Suite 600
Washington, DC 20001
(202) 393-8690
(202) 347-3622 (fax)
mbowman@ADFlegal.org

/S/ JAMES R. CONDE
R. TRENT MCCOTTER
JAMES R. CONDE*
Boyden Gray PLLC
800 Connecticut Ave NW, Suite 900
Washington, DC 20006
(202) 955-0620
tmccotter@boydengray.com
jconde@boydengray.com

** Lead Counsel*
Counsel for Plaintiffs Agency for Health
Care Administration & Florida
Department of Management Services

ANDREW T. SHEERAN
GENERAL COUNSEL
Agency for Health Care Administration
2727 Mahan Drive, Mail Stop #3
Tallahassee, Florida 32308
(850) 412-3670
Andrew.Sheeran@ahca.myflorida.com

Counsel for Plaintiff Agency for Health
Care Administration

JULIE MARIE BLAKE
Alliance Defending Freedom
44180 Riverside Parkway
Lansdowne, Virginia 20176
(571) 707-4655
(571) 707-4790 (fax)
jblake@ADFlegal.org

DAVID A. CORTMAN
Alliance Defending Freedom
1000 Hurricane Shoals Road NE,
Suite D1100
Lawrenceville, Georgia 30043
(770) 339-0774
(770) 339-6744 (fax)
dcortman@ADFlegal.org

** Lead Counsel*
Counsel for Plaintiff Catholic Medical
Association

KRISTEN LARSON
GENERAL COUNSEL
Florida Department of Management
Services
4050 Esplanade Way
Tallahassee, Florida 32399
(850) 922-2137
Kristen.Larson@dms.fl.gov

Counsel for Plaintiff Florida Department
of Management Services

Dated: June 24, 2025

CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 32(g), I hereby certify that this motion complies with the requirements of Fed. R. App. P. 27(d)(1)(E) because it has been prepared in 14-point Equity, a proportionally spaced font, and that it complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because it contains 150 words, according to the count of Microsoft Word.

Dated: June 24, 2025

/s/ James R. Conde
James R. Conde

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2025, I electronically filed the foregoing document with the Clerk of this Court by using the CM/ECF system, which will serve all parties automatically.

Dated: June 24, 2025

/s/ James R. Conde
James R. Conde